

February 25, 2022

VIA ELECTRONIC FILING

Ms. Jocelyn Boyd
Chief Clerk and Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

**Re: Comments on Notice of Filing and Public Hearings Template
Docket No. 2020-247-A**

Dear Ms. Boyd:

Pursuant to the Notice of Follow-Up Workshop to Discuss Commission Notices Included in Customer Bill Inserts ("Notice") issued by the Public Service Commission of South Carolina ("Commission") on January 24, 2022, in the above-referenced docket, Piedmont Natural Gas Company, Inc. ("Piedmont") hereby submits the following written comments on the Notice of Filing and Public Hearings template ("Template") that was attached to the Notice.

Piedmont supports the Commission's efforts to make regulatory notices easier for customers to understand. In support of this endeavor, Piedmont finds that two modifications to the Template are warranted, as follows:

1. **"What is [Insert Co. Name] asking the Commission to approve?"** As proposed in the Template, Piedmont is concerned that this section is overly vague and could be misleading to customers. There are certain proceedings before the Commission that are not discretionary to a utility. For Piedmont, the most pertinent example is the annual proceeding for review of Piedmont's purchased gas adjustment and gas purchasing policies. Therefore, Piedmont recommends that the Commission instead phrase this section header in the Template as either "What is this docket about?" or "What is the Commission considering in this docket?"
2. **"What is the impact of the Company's request on an average household bill?"** As proposed in the Template, this section quantifies the impact of a gas company's request on an average household at 100 therms/month. Piedmont is concerned that using 100 therms/month to calculate the household bill impact will not accurately represent the

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impact to Piedmont's residential customers – i.e. the households served by Piedmont. The average residential customer served by Piedmont uses approximately 570 therms/year of natural gas. The amount of natural gas used by Piedmont's residential customers is also weather dependent, with higher usage typically occurring in the colder months of the winter season and significantly lower usage typically occurring in the warmer months of the spring, summer and fall seasons. Therefore, the bill impact to a household of any rate change will significantly vary month-to-month. In light of this, Piedmont recommends that 50 therms/month be adopted as the basis for calculating the household bill impact for natural gas customers in customer bill inserts. The reason is that 50 therms/month is the rounded levelized average of the 570 therms/year of natural gas that Piedmont's typical residential customer uses per year.

Thank you for your assistance with this matter. If you have any questions regarding this filing, you may reach me at the number shown above.

Sincerely,

/s/ T. Richmond McPherson
T. Richmond McPherson

TRM/sko

cc: ORS
Bruce Barkley
Pia Powers
James H. Jeffries IV